

Malena F. Barzilai  
Senior Counsel, Government Affairs  
Windstream Corporation  
1101 17<sup>th</sup> Street, N.W., Suite 802  
Washington, DC 20036

(202) 223-4276  
malena.barzilai@windstream.com



**VIA ECFS**

***EX PARTE***

March 18, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *WC Docket No. 10-90, Connect America Fund; WC Docket No. 05-337, High-Cost Universal Service Support*

Dear Ms. Dortch:

On March 14, 2013, Eric Einhorn and I, from Windstream Corporation (“Windstream”), met with Michael Steffen, Legal Advisor to Chairman Julius Genachowski; Julie Veach, Chief of the Wireline Competition Bureau; and Carol Matthey, Deputy Chief of the Wireline Competition Bureau about potential modifications to the Connect America Fund (“CAF”) Phase I program. On March 18, Mr. Einhorn and I met with Mr. Steffen and Ms. Veach to discuss the same topic.

Windstream urged the Commission to adopt the proposals for modification of CAF Phase I that were raised in the Further Notice of Proposed Rulemaking<sup>1</sup> and advocated in joint comments submitted by USTelecom, ITTA, and the ABC Coalition.<sup>2</sup> Consistent with its prior advocacy, Windstream advocated that the Commission permit price cap carriers to satisfy their buildout obligations with second-mile fiber deployments to upgrade Digital Subscriber Line Access Multiplexers (DSLAMs) that are currently served by copper. Windstream discussed how the Commission could address any overbuilding concerns by only providing per-mile fiber funding for the portions of fiber deployments that do not overlap areas served by cable. Windstream also emphasized the need to ensure that only those areas that actually are served by

---

<sup>1</sup> See *Connect America Fund*, Further Notice of Proposed Rulemaking, WC Docket No. 10-90, FCC 12-138, ¶¶ 7 (rel. Nov. 19, 2012) (“*FNRPM*”).

<sup>2</sup> See Comments of the United States Telecom Association, Independent Telephone & Telecommunications Alliance, and the ABC Coalition, WC Docket Nos. 10-90, 05-337 (filed Jan. 28, 2013); Reply Comments of the United States Telecom Association, the Independent Telephone & Telecommunications Alliance, and the ABC Coalition, WC Docket Nos. 10-90, 05-337 (filed Feb. 11, 2013).

4/1 Mbps broadband—by an incumbent local exchange carrier and/or an unsubsidized competitor—would be excluded from eligibility for CAF Phase I support.

If the Commission adopts the modifications suggested in the joint comments, Windstream would expect to be able to bring 4/1 or better broadband service to at least 100,000 locations that lack 4/1 service today.

Please feel free contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Michael Steffen  
Julie Veach  
Carol Matthey